REMARKS

Rejection of claims 1-20 under 35 U.S.C. § 102 (e) as being anticipated by US 7,475,241 (Patel)

      Applicant respectfully traverses the rejection of claims 1-20.

      Applicant respectfully submits that Patel does not anticipate, either expressly or inherently, each and every element as set forth in independent claims 1 and 11. For example, independent claim 1 recites "generating a first application key independently at the network based server corresponding to the locally generated first dynamic seed... generating a second application key independently at the client corresponding to the locally generated second dynamic seed," and "providing the generated first application key to facilitate authenticating an application at the network based server and the generated second application key to facilitate authenticating an application at the client," which is not anticipated either expressly or inherently, in Patel.

      Patel discloses that a mobile node registers with a home agent by sending a registration request to the home agent. The home agent forwards the received request message to a server. The server then derives key information from a key or password associated with the mobile node. The server then sends a reply message including the key information to the home agent. The home agent derives a shared key from the key information, and sends a registration reply to the mobile node. The registration reply indicates that the mobile node is to derive a shared key. The mobile node then derives a shared key from key information stored at the mobile node. See Abstract, Patel.

      Applicant respectfully disagrees with the statement in item 5, page 3, of the Office Action dated July 23, 2009 that "Patel et al. discloses a method of providing authentication services...the method comprising...generating a first application key (i.e. shared key) independently at the network based server corresponding to the locally generated first dynamic seed, wherein the first application key is generated without the client intervention; generating a second application key independently at the client corresponding to the locally generated second dynamic seed, wherein the second application key is generated without utilizing the first application key(see col. 5, lines 13-15, col. 7, lines 15-27, col. 8, lines 66-67, col. 9, lines 1-11)." It appears that the Office Action equates Applicant's application key with Patel's shared key. Patel discloses that the mobile node and the home agent *generate the shared key utilizing key*

material and a random number. See col. 9, lines 3-10 of Patel. However, Office Action in item 5, page 3 states that "Patel et al. discloses a method...comprising...generating, responsive to the authentication, a first dynamic seed (seed is derived from key information that includes a random number)." From the above Office Action statement and cited passage col. 9, lines 3-10 of Patel, it is clear that the Office Action equates Applicant's *dynamic seed with Patel's shared key that is derived from key information.* Applicant has claimed four distinct limitations at the server and the client, i.e. the first and second dynamic seeds and the first and second application keys. As shown above, however, the Office Action points to only one feature from Patel to disclose these limitations, Patel's shared key. Applicant respectfully submits that the same Patel's shared key cannot be used to disclose Applicant's first and second application key and with Applicant's first and second dynamic seed. Thus, Applicant's claim limitation of "generating a first application key" and "generating a second application key" is not disclosed in Patel.

Additionally, in Applicant's claim, the first dynamic seed and the first application key is generated at the network based server, and the second dynamic seed and the second application key is generated at the client. Thus, Applicant has claimed two distinct limitations at the server, i.e. the first dynamic seed and the first application key, and two distinct limitations at the client, i.e. the second dynamic seed and the second application key. The Office Action, however, points to only one feature from Patel to disclose these limitations, the shared key, at the client and the server. In other words, Patel generates only one item at each of the server and the client, i.e. the shared key. Since Applicant claims two limitations at each of the server and the client and Patel only one item, Applicant respectfully submits that it is inappropriate to state that Patel's shared key discloses Applicant's application keys and dynamic seeds.

Moreover, Patel discloses that the shared key is generated using the key information. However, Patel makes no mention of generating the shared key that is *corresponding to the locally generated dynamic seed.* In contrast, Applicant's claim recites "generating a first application key...*corresponding to the locally generated first dynamic seed...* generating a second application key...*corresponding to the locally generated second dynamic seed.*" Thus, Applicant's claim has two distinct limitations, i.e. application key and dynamic seed, and the application key is generated corresponding to the dynamic seed. On the other hand, since Patel discloses only one type of key i.e. shared key, the Patel fails to disclose that the shared key is generated corresponding to the dynamic seed at the server and the client.

In view of the foregoing, Applicant respectfully submits that Patel does not disclose the above mentioned claim limitations as recited in Applicant's claim 1, so the Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C 102.

Regarding independent claim 11, Applicant respectfully submits that the above discussed arguments apply equally to the limitations of claim 11. Applicant therefore respectfully requests withdrawal of the rejection of claim 11 under 35 U.S.C 102.

Dependent claims 2-10 and 12-20 depend from, and include all the limitations of independent claims 1 and 11. Therefore, Applicant respectfully requests the reconsideration of dependent claims 2-10 and 12-20 and requests withdrawal of the rejection.

Conclusion

Applicant has reviewed the other references of record and believes that Applicant's claimed invention is patentably distinct, novel and nonobvious over each reference taken alone or in combination. Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,
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